

Federal Defenders  
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July 18, 2024

**By E-mail and ECF**

The Honorable Dora L. Irizarry  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Re: United States v. Jose Rodriguez Tineo, 23-CR-223 (DLI)**

Dear Judge Irizarry,

On behalf of Mr. Rodriguez-Tineo, I write jointly with the government to provide the Court with a status update in advance of the status conference scheduled for July 24, 2024 at 10:30am.<sup>1</sup> Since the last status conference, during which the Court denied Mr. Rodriguez-Tineo's motion to suppress, the parties have renewed plea negotiations. We believe that we are close to a resolution, and expect to be able to schedule a guilty plea this summer. However, we are still finalizing certain aspects of the agreement, and would benefit from some additional time.

In light of the above, the parties jointly request an adjournment of the status conference for 30 days to complete plea negotiations. Should the Court grant this adjournment, the parties propose a mid-August 2024 date for a status conference or guilty plea. For the reasons stated above, the parties jointly request that the Court enter an order excluding time pursuant to the Speedy Trial Act, 18 U.S.C. § 3161, from July 24, 2024 until the new status conference date.

Thank you for your consideration.

Respectfully Submitted,

/s/

Mia Eisner-Grynberg  
Deputy Attorney-in-Charge  
(718) 330-1257

cc: AUSA Megan Larkin (by ECF and email)  
PTSO David Picozzi (by email)  
PTSO Jada Gross (by email)

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<sup>1</sup> The parties apologize for missing the Court's deadline of July 17, 2024. Regrettably, undersigned counsel was in a car accident yesterday and was unable to file this report. Fortunately, I am not injured and back at work today.